

IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS

MATTHEW F. ABBOTT)
Plaintiff)
-vs-) NO: 08 C 642
STARLINGER NA, et al.)
Defendants)

NOTICE OF MOTION

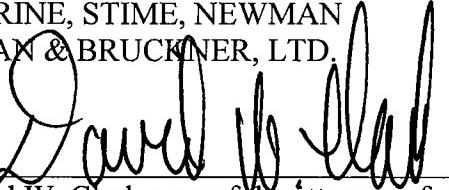
TO:

PLEASE TAKE NOTICE that on the 8th day of April, 2008, at 9:00 a.m. or as soon thereafter as counsel may be heard, the undersigned shall appear before the Honorable Judge John P. Darrah, or such other judge as may be sitting in his place in Room 1203 of the Everett McKinley Dirksen United States Courthouse, 219 S. Dearborn Street, Chicago, Illinois and shall present **Defendant, Starlinger North America Inc.'s Motion to Extend to Answer**, a copy of which is enclosed herewith and hereby served upon you.

RESPECTFULLY SUBMITTED

PEREGRINE, STIME, NEWMAN
RITZMAN & BRUCKNER, LTD.

By: _____


David W. Clark, one of the attorneys for
Defendant, Starlinger North America, Inc.

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Plaintiff)
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-vs-) NO: 08 C 642
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MOTION TO EXTEND TIME TO ANSWER

NOW COMES the Defendant, STARLINGER NORTH AMERICA, INC., by and through its attorneys, PEREGRINE, STIME, NEWMAN, RITZMAN & BRUCKNER, LTD., and moves this Honorable Court for an Order extending the time in which to file responsive pleadings for an additional twenty (20) days from the date of this hearing. In support thereof, Defendant, STARLINGER NORTH AMERICA, INC., states as follows:

1. Plaintiff's Complaint is premised in products liability and alleges four different causes of action.
2. Plaintiff filed his Amended Complaint on March 8, 2008. Defendant, STARLINGER NORTH AMERICAN, INC.'s answer or responsive pleadings would therefore be due on or before March 28, 2008.
3. That Defendant, STARLINGER NORTH AMERICA, INC., is the distributor of a rubber injection molding machine whose manufacturer is in Austria.
4. That in order to prepare a defense to Plaintiff's cause of action, it is necessary for the Defendant, STARLINGER NORTH AMERICA, INC., to consult with Austria and review certain documents which needs to be translated to English from German.

5. Due to the translation issues and the relationship between the distributor and the manufacturer, Defendant, STARLINGER NORTH AMERICA, INC. requests additional time to file its responsive pleadings on or before April 28, 2008.

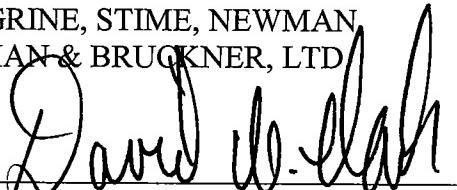
6. Plaintiff will not be prejudiced by this short delay especially given the fact that they have not issued Summons to the foreign defendants, including the manufacturer.

WHEREFORE, Defendant, STARLINGER NORTH AMERICA, INC., prays this Honorable Court for an extension of time to file its responsive pleadings to April 28, 2008.

RESPECTFULLY SUBMITTED

PEREGRINE, STIME, NEWMAN,
RITZMAN & BRUCKNER, LTD

By: _____



David W. Clark, one of the attorneys for
Defendant, Starlinger North America, Inc.

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